

1 CHRISTOPHER CHIOU
2 Acting United States Attorney
3 Nevada Bar No. 14853
4 PETER S. LEVITT
5 Assistant United States Attorney
6 501 Las Vegas Blvd. South, Suite 1100
7 Las Vegas, Nevada 89101
8 Tel: (702) 388-6336
9 peter.s.levitt@usdoj.gov
10 *Attorneys for the United States of America*

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 DANIELLE PARTINGTON,

12 Defendant.

Case No: 2:21-mj-00687-EJY

11 **Stipulation for a**
12 **Protective Order**

13
14 The parties, by and through the undersigned, respectfully request that the Court issue an
15 Order protecting from disclosure to the defendant DANIELLE PARTINGTON, the public, or
16 any third party not directly related to this case, any and all unredacted discovery (the
17 “Protected Material”) in this case. The parties state as follows:

18 1. On August 11, 2021, a two-count Criminal Complaint was filed charging
19 Partington with Conspiracy and Distribution of a Controlled Substance (Fentanyl), and Aiding
20 and Abetting, in violation of 21 U.S.C. §§ 841(a)(a), (b)(1)(C), 846, and 18 U.S.C. § 2. ECF No.

21 1.

22 2. The preliminary hearing is currently set for March 9, 2022.

23 3. The government is preparing to produce redacted discovery in excess of 1,400
24 Bates-stamped items to defense counsel. Some of the Bates stamped items contain multiple files

1 and some consist of recordings and charts.

2 4. This case involves the decedent's surviving widow and possibly other victims. In
3 order to protect other potential victims, witnesses, and unrelated persons involved in and
4 revealed by the Protected Material, the parties intend to restrict access to the Protected Material
5 in this case to the following individuals: the named defendants, attorneys for all parties, and
6 any personnel that the attorneys for all parties consider necessary to assist in performing that
7 attorneys' duties in the prosecution or defense of this case, including investigators, paralegals,
8 experts, support staff, interpreters, and any other individuals specifically authorized by the
9 Court (collectively, the "Covered Individuals").

10 5. Without leave of Court, the Covered Individuals shall not:

- 11 a. make copies for, or allow copies of any kind to be made by any other person
12 of the Protected Material in this case;
- 13 b. allow any other person to read, listen, or otherwise review the Protected
14 Material;
- 15 c. use the Protected Material for any other purpose other than preparing to
16 defend against or prosecute the charges in the indictment or any further
17 superseding indictment arising out of this case; or
- 18 d. attach the Protected Material to any of the pleadings, briefs, or other court
19 filings except to the extent those pleadings, briefs, or filings are filed under
20 seal.

21 6. Nothing in this stipulation is intended to restrict the parties' use or introduction of
22 the Protected Material as evidence at trial or support in motion practice.

23 7. The parties shall inform any person to whom disclosure may be made pursuant
24 to this order of the existence and terms of this Court's order.

1 8. The defense hereby stipulates to this protective order.

2 DATED this 24th day of January, 2022.

3 Respectfully submitted,

4 For the United States:

5 CHRISTOPHER CHIOU
6 Acting United States Attorney

7 /s/ Peter S. Levitt

8 PETER S. LEVITT
9 Assistant United States Attorney

10 For the Defense:

11 MICHAEL MICELI, ESQ.

12 /s/ Michael Miceli, Esq.

13 Attorney for DANIELLE PARTINGTON

14 **IT IS SO ORDERED:**

15 Clayton J. Zouchak
16 United States Magistrate Judge

17 January 25, 2022
18 _____
19 Date